

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

PORTERFIELD-SCHEID MANAGEMENT  
COMPANY, LLC,  
Debtor in Possession

Chapter 11

Case No. 1:24-bk-01127

DEBTOR'S RESPONSE TO THE MOTION OF THE UNITED  
STATES TRUSTEE TO CONVERT THE MATTER TO A PROCEEDING  
UNDER CHAPTER 7 OR, IN THE ALTERNATIVE, TO DISMISS THE CASE

AND NOW, this 26<sup>th</sup> day of February, 2025, comes the Debtor, Porterfield-Scheid Management Company, LLC, by and through its counsel, CGA Law Firm, Lawrence V. Young, Esquire, and consents to the Dismissal of the within Chapter 11, responding to the specific averments of the United States Trustee's motion as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted, although it is asserted that it is in the best interest of the creditors and the estate for the dismissal of this case.
6. The averment constitutes a conclusion of law to which no response of pleading is required.
7. Admitted.
8. The averments of the remaining paragraphs speak for themselves.
9. It is admitted that the monthly operating reports are required to be filed.
10. Admitted.
11. Admitted.

12. The averments constitute a conclusion of law to which no response of pleading is required.

13. The averments constitute a conclusion of law to which no response of pleading is required.

14. Although the Debtor consents to the requested relief, the Debtor would point out that it has sold one of its three mortuary facilities and refinanced the other two facilities, paying off in excess of \$2 million worth of debt in the process, and restructuring the debt into a form that will allow the Debtor to proceed in a profitable fashion.

15. The averments constitute a conclusion of law to which no response of pleading is required.

16. The Debtor consents to the current chapter 11 case being dismissed.

WHEREFORE, the Debtor consents to the relief requested and having the current chapter 11 case dismissed and the entry of the proposed order submitted by the Office of the United States Trustee shall not be entered converting the case to a case under chapter 7, but rather dismissing this case. Proposed order is attached.

Respectfully submitted,  
CGA Law Firm

/s/Lawrence V. Young  
Lawrence V. Young, Esquire  
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York, PA 17401  
Counsel for the Debtor,  
Porterfield-Scheid Management Company, LLC